

FILED
U.S. DISTRICT COURT
NORTHERN DIST. OF TX
FT. WORTH DIVISION

2014 JUL 18 AM 11:58

ORIGINAL
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

CHRISTOPHER ROBERT WEAST (1)

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§
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4-14-CR-023-A

CLERK OF COURT

MOTION FOR LEAVE OF COURT TO FILE
MOTION TO SUPPRESS

COMES NOW, Christopher Robert Weast, through counsel, Assistant Federal Public Defender Angela R. Saad, and respectfully moves this Court for an order granting the Defendant leave of court to file a Motion to Suppress out of time for the following reason:

1. The Defendant is scheduled for trial on July 28, 2014. Pursuant to the Court's order in this case, pretrial motions must be filed June 11, 2014.

2. Defense counsel was appointed February 21, 2014 to represent Mr. Weast. On April 22, 2014, counsel's appointment was terminated. Defense counsel was reappointed on June 5, 2014 for the competency hearing. On July 8, 2014, we were again reappointed to represent the defendant for the trial. On July 15, 2014, the Court denied our motion for reconsideration of appointment of counsel. While defense counsel was appointed to represent the defendant when the June 11, 2014 deadline passed, the scope of representation was limited to "the competency hearing and related matters." Based on the foregoing, defense counsel respectfully requests leave of court to file the Motion to Suppress out of time.

3. Counsel respectfully requests that this Honorable Court grant leave to file the Motion to Suppress out of time.

WHEREFORE, Defendant respectfully requests that this Honorable Court to allow counsel

to file out of time the Motion to Suppress.

Respectfully submitted,

JASON HAWKINS
Federal Public Defender
Northern District of Texas

BY: 

Angela Saad
Asst. Federal Public Defender
819 Taylor Street, Room 9A10
Fort Worth, TX 76102-4612
(817) 978-2753
Texas State Bar No. 24059016

CERTIFICATE OF CONFERENCE

I have conferred with the attorney for the government, Aisha Saleem, and she is not opposed to this motion.


Angela Saad

CERTIFICATE OF SERVICE

I, Angela Saad, hereby certify that on July 18, 2014, the above motion was had delivered to Aisha Saleem at the Office of The United States Attorney 801 Cherry Street, Suite 1700, Fort Worth, TX 76102.


Angela Saad